



Public Health Risk-Based Inspection System for Processing and Slaughter

Overview

February 5, 2008

Carol Maczka, PhD
Assistant Administrator
Office of Food Defense and Emergency Response



Where We Are Today.....

- Evolved from FSIS' earlier work on developing a Risk-Based Inspection (RBI) algorithm to rank processing and slaughter establishments
- Using a public health-based, data driven approach
- Examined and improved every aspect of our system
- We heard what you said:
 - Addressing many of the concerns expressed by the USDA OIG, consumer groups, and industry regarding the earlier RBI.
- We are looking for your technical input so that we can continue to improve our draft concept



Goal of the Public Health Risk-Based Inspection System

Focus FSIS resources to ensure food safety systems are under control to further achieve FSIS' public health mission.

- Focus inspection activities on vulnerable points in the food safety system
- Prioritize deployable resources to establishments with evidence of a lack of process control
- Resource neutral system



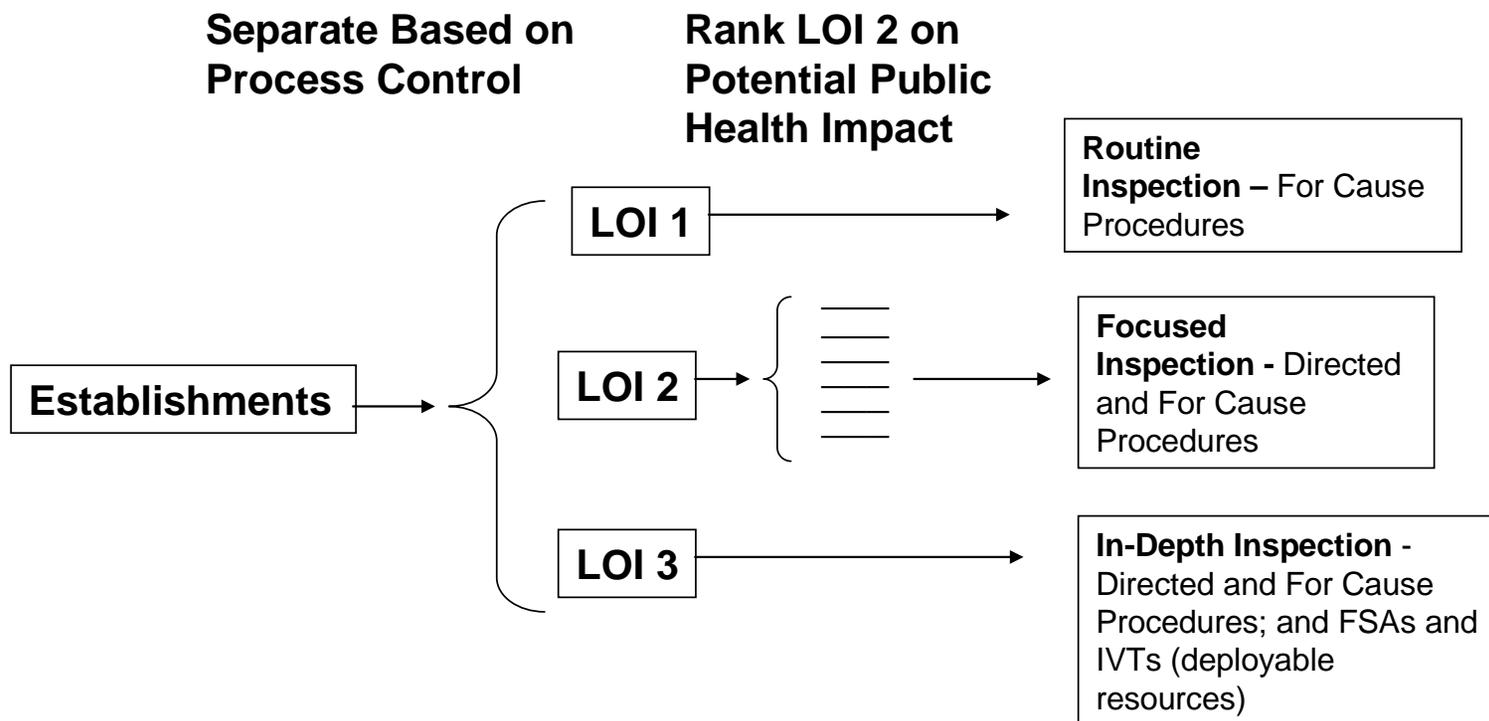
Proposed System Components

System consists of two components:

1. Across establishments - Algorithm to allocate inspection activities across plants
2. Within establishments – Approach to focus inspection activities at vulnerable points in an establishment

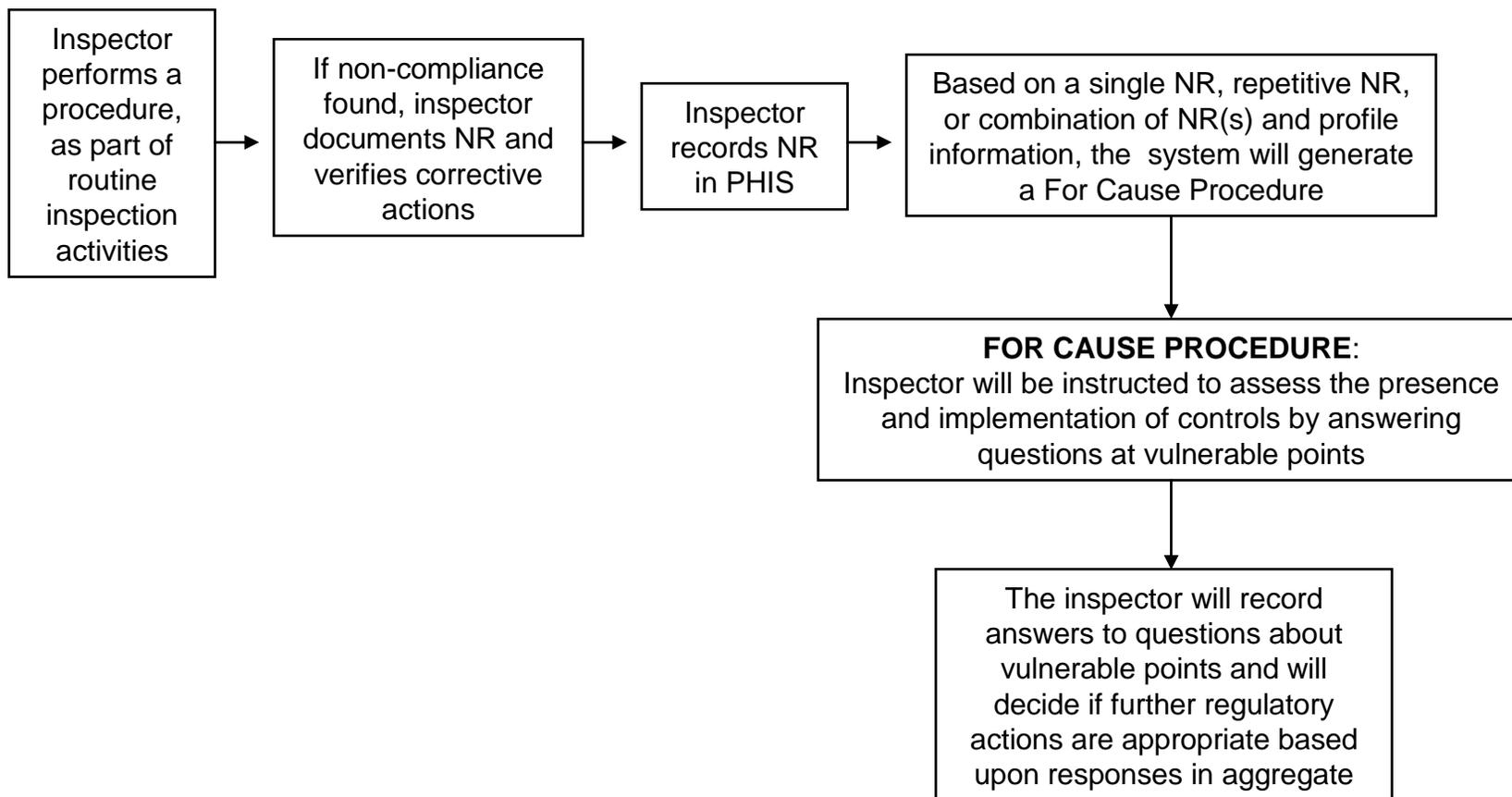
vulnerable points - where greatest microbial contamination or growth occurs if process control is not maintained

Levels of Inspection and Within Plant Activities*



*verify presence and implementation of controls at vulnerable points

For Cause and Directed Procedures



Directed Procedure:

Directed procedures are performed in Focused (LOI 2) and In-Depth (LOI 3) Inspection establishments



Level of Inspection (LOI) Categorization

- Sort establishments into LOI 3 based on specified criteria
- Sort establishments into LOI 1 based on specified criteria
- Remaining establishments are placed into LOI 2
 - Within LOI 2, rank order establishments by their contribution to public health



In-Depth Discussion

- For cause and directed procedures
- Criteria for placing establishments in LOI
- Case studies and solutions



Benefits of Proposed System

- System is data driven, science-based, and works within our current regulatory framework (e.g., HACCP, SSOPS, SPS)
- Better enables inspection force to link and respond to noncompliances
- Will ensure inspectors verify the execution of decisions made by establishments in their hazard analysis (i.e., prerequisite programs)
- Focus on pathogen-product pairs that most contribute to disease



Benefits of Proposed System

- Approach has multiple advantages
 - Transparent
 - All high pathogen failure plants are ranked high
 - Plants with public health-related NR rates in top percentile (i.e., preliminary analysis indicates top 97th percentile) are ranked high
 - Categorization independent of production volume
 - Compatible with FSIS sampling programs
- In aggregate, information collected at vulnerable points will provide support for further regulatory or enforcement action